



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

August 6, 2014

BY ELECTRONIC MAIL

Robert Law, PhD
CPG Project Coordinator
demaximis, inc.
186 Center Street, Suite 290
Clinton, NJ 08809

Re: Lower Passaic River Study Area (LPRSA) – Remedial Investigation/Feasibility Study (RI/FS) Model – Administrative Agreement and Order on Consent (AOC) for RI/FS – CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection (EPA) is in receipt of your letter dated July 18, 2014, sent on behalf of the LPRSA Cooperating Parties Group (CPG), which provided the status of modeling activities pursuant to the AOC. In response, EPA seeks to reiterate our understanding of the upcoming modeling submittals and requests further information, provided directly below.

1. Sediment Transport Modeling Code, Input Files and Example Output

EPA's contractor HDR received information on July 31, 2014.

2. Dioxin and PCB Bed Maps

It is EPA's understanding that subsurface maps were prepared in the fall of 2013 for dioxin, mercury, and PCBs prior to receipt of SSP2 data. Please provide EPA with those previously prepared maps, even in their draft state, no later than August 11th. EPA has previously requested these pre-SSP2 data maps, and we continue to want to receive them in order to compare the predictions to the maps prepared with SSP2 data. We also look forward to receipt of the updated the bed maps that include the SSP2 data by August 22, 2014.

3. Chemical Fate Transport Code, Input Files and Example Output, and Carbon Simplification

EPA understands that this information will be provided to EPA and our contractor by September 19, 2014.

In an email dated April 9, 2014, EPA requested that CPG provide a memorandum no later than May 30, 2014, explaining an alternate approach for:

- Representation of the exchange of contaminants between the sediment bed and the water column in the contaminant fate and transport (in lieu of the "kluge")
- Changes in bathymetry, bed composition and organic carbon due to dredging and backfill

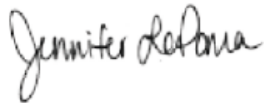
- Contaminant Fate and Transport calibration passed forward to the bioaccumulation calculations
- List of proposed changes to bioaccumulation model as discussed during the February 13, 2014 web meeting.

While your letter dated July 18, 2014 contained some information responsive to these items, primarily it promises to address EPA's request in future submissions. The information contained in your July 18th letter does not satisfy EPA's request for a memorandum. The requested memorandum should be provided to EPA no later than August 20, 2014.

The CPG's delay in providing this memorandum, coupled with the lack of modeling coordination meetings, is a detriment to EPA's oversight responsibilities and to the timely completion of the LPRSA RI/FS model. Failure of the CPG to provide the memorandum further delays EPA's ability to provide feedback, resulting in a risk that the CPG may expend resources and move forward in a path that is unacceptable to EPA, thus further delaying the completion of the model.

Please contact me at 212-637-4328 or LaPoma.Jennifer@epa.gov if you wish to discuss further or if there is any clarification needed.

Sincerely,



Jennifer LaPoma
Remedial Project Manager
U.S. EPA – Region 2

cc: Willard Otto (demaximis)
Ray Basso (EPA)
Sarah Flanagan (EPA)